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6 Attorneys for Plaintiff Umro Realty Corp  
7 d/b/a The Agency

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
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11 UMRO REALTY CORP d/b/a THE  
AGENCY,

12 Plaintiff,

13 vs.

14 THE AGENCY, INC.,

15 Defendant.  
16

Case No. 2:16-cv-02130-JCM-CWH

**STIPULATION AND ORDER TO  
EXTEND EXPERT DISCOVERY  
DEADLINES**

**(FIRST REQUEST)**

17 The parties stipulate to extend the currently scheduled expert discovery deadlines  
18 by 60 days. This is the first requested extension of these deadlines. In support of this  
19 stipulation, the parties state as follows:

20 **I. DISCOVERY COMPLETED**

21 **A. Fed. R. Civ. P. 26(a)(1) Initial Disclosures:**

22 Both parties served their initial disclosures on March 14, 2017.  
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1           **B.     Written Discovery:**

2           Plaintiff served defendant with interrogatories, requests for production of  
3 documents, and requests for admission on December 9, 2016. Defendant responded to these  
4 written discovery requests on January 20, 2017 and has agreed to supplement these responses by  
5 May 22, 2017.

6           Defendant served plaintiff with interrogatories, requests for production of  
7 documents, and requests for admission on April 21, 2017. Defendant has granted plaintiff an  
8 extension to respond or object to these written discovery requests by June 20, 2017.

9           **C.     Depositions:**

10          Plaintiff has noticed the deposition of the following witnesses for the following  
11 dates, though the parties are still negotiating the potential rescheduling of some of these  
12 depositions:

13                   Kathryn Holbert                   June 12, 2017, 9:00 a.m.

14                   Marie Wdzieczkowski           June 16, 2017, 9:00 a.m.

15                   The Agency, Inc. (30(b)(6))   June 19, 2017, time to be determined

16                   Randolph Reyes                   June 20, 2017, time to be determined

17                   Lenny Gervasio                   June 21, 2017, time to be determined

18 **II.     REMAINING DISCOVERY TO BE COMPLETED**

19          Defendant still owes plaintiff supplemental discovery responses, as noted above.  
20 Plaintiff also still has outstanding discovery responses that are due on June 20, 2017. In  
21 addition, plaintiff plans to take the depositions noted above in June 2017. The parties may  
22 depose additional witnesses and issue additional written discovery requests to one another.

1 **III. REASON FOR EXTENSION OF DISCOVERY DEADLINES**

2 The current deadlines for disclosure of expert witnesses are June 8, 2017 for  
3 initial expert disclosures and July 7, 2017 for rebuttal disclosures. Due to the outstanding  
4 discovery requests that the parties are currently working on, the parties wish for additional time  
5 to complete this written discovery before they have to disclose their expert witnesses. In  
6 addition, plaintiff wishes to complete the depositions noted above before its expert disclosures  
7 are due. The parties have thus agreed to a modest 14-day extension of the expert discovery  
8 deadlines only, to allow the parties sufficient time to finish their written discovery and depose  
9 these witnesses. This is the first request to extend these deadlines. The parties do not request to  
10 extend any other currently scheduled deadlines at this time.

11 **IV. PROPOSED CHANGES TO DISCOVERY DEADLINES**

12 **A. Fed. R. Civ. P. 26(a) Disclosures (Experts):**

13 The parties propose that the deadlines for Fed. R. Civ. P. 26(a)(2) disclosure of  
14 experts and expert reports be extended as follows:

- 15 1. The parties shall disclose experts and expert reports by Thursday, June 22,  
16 2017, which is 46 days before the discovery cut-off date;
  - 17 2. The parties shall disclose rebuttal experts and their reports by Friday, July  
18 21, 2017, which is 17 days before the discovery cut-off date.
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*Attorney for Defendant*

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